

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CLOSEABILITY DATA SOLUTIONS, INC.	:	Case No.: 1:25-cv-00804-BMB
	:	Judge: Bridget Meehan Brennan
PLAINTIFF,	:	Mag. Judge James E. Grimes, Jr.
	:	
VS.	:	
	:	PLAINTIFF’S MOTION FOR
ALTISOURCE S.À R.L.	:	JUDICIAL NOTICE
	:	
DEFENDANT.	:	

Now comes Plaintiff, CloseAbility Data Solutions, Inc., by and through undersigned counsel, and pursuant to Rule 201 of the Federal Rules of Evidence, respectfully moves this Honorable Court to take judicial notice of information Altisource caused to be published on the NASDAQ website, which information is derived from its required filings with the United States Securities and Exchange Commission.

Altisource’s own disclosures to NASDAQ and SEC confirm that it actively operates in the United States. (See Exhibit “A”) These facts are drawn from official government filings and are publicly available, verifiable, and not reasonably subject to dispute. A supporting memorandum is attached hereto.

WHEREFORE, Plaintiff respectfully requests that the Court grant this motion and take judicial notice of the public information as outlined.

Respectfully Submitted,

/s/ Wendy S. Rosett
Wendy S. Rosett, ID# 0055870

Attorney and Counselor-at-Law
16781 Chagrin Boulevard, #304
Shaker Heights, Ohio 44120
216.533.4139 (cellular phone)
216.491.2125 (voicemail/fax)
owlesq@aol.com
Attorney for the Plaintiff

CERTIFICATE OF SERVICE

A true and accurate copy of the foregoing was sent via the Court's Electronic Notification System and/or regular U.S. mail, postage prepaid, this 18th day of June, 2025 to all parties listed on the Court's dockets as participants in this matter.

Respectfully submitted,

/s/ Wendy S. Rosett
Wendy S. Rosett, ID# 0055870

MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR JUDICIAL NOTICE

I. Introduction

Plaintiff, CloseAbility Data Solutions, Inc., submits this memorandum in support of its motion requesting that the Court take judicial notice of specific public representations made by Defendant on the NASDAQ website and in filings with the Securities and Exchange Commission (SEC).

II. Legal Standard

Under Rule 201(b) of the Federal Rules of Evidence, a court may take judicial notice of facts that are not subject to reasonable dispute because they are:

1. Generally known within the trial court's jurisdiction; or
2. Capable of accurate and ready determination by resorting to sources whose accuracy cannot reasonably be questioned.

Courts routinely take judicial notice of official public records, such as SEC filings and stock exchange disclosures. See *In re NAHC, Inc. Sec. Litig.*, 306 F.3d 1314, 1331 (3d Cir. 2002) (courts may take judicial notice of public SEC filings).

III. Facts Subject to Judicial Notice

Defendant is listed on the NASDAQ stock exchange under the ticker symbol "ASPS." The NASDAQ summary for the company is publicly available at:

<https://www.nasdaq.com/market-activity/stocks/asps> (the "Summary").

These documents are part of the public record, filed under penalty of law, and are intended for a U.S. audience. Altisource has expressly disclosed in these filings that it maintains operations and conducts business in the United States.

IV. Relevance

These facts are directly relevant to any argument that Defendants may raise about jurisdiction, venue, or business activity in the United States. The facts are not speculative and are

derived from official corporate filings and a recognized public market website. Therefore, judicial notice is appropriate.

V. Conclusion

For the foregoing reasons, Plaintiff respectfully requests that the Court take judicial notice of Altisource's public representations on the NASDAQ website and its SEC filings, pursuant to Rule 201 of the Federal Rules of Evidence.

Respectfully Submitted,

/s/ Wendy S. Rosett
Wendy S. Rosett, ID# 0055870
Attorney and Counselor-at-Law
16781 Chagrin Boulevard, #304
Shaker Heights, Ohio 44120
216.533.4139 (cellular phone)
216.491.2125 (voicemail/fax)
owlesq@aol.com
Attorney for the Plaintiff